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10 Global LLC, Arnold Fisher, Kenneth Fisher, Steven Fisher,
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Fisher Brothers Financial and Development Company LLC*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 GEORGE JARAMILLO, II, an individual,

14 *Plaintiff,*

15 v.

16 AREA 15 LAS VEGAS LLC, a Delaware
17 Limited Liability Company, AREA 15
18 GLOBAL LLC, a Delaware Limited
Liability Company, ARNOLD FISHER, an
Individual, KENNETH FISHER, an
Individual, STEVEN FISHER, an
Individual, WINSTON FISHER, an
Individual, FISHER BROTHERS
19 MANAGEMENT CO. LLC, a New York
20 Limited Liability Company, FISHER
BROTHERS FINANCIAL AND
21 DEVELOPMENT COMPANY LLC, a
New York Limited Liability Company, and
22 DOES 1-50 Inclusive,

23 *Defendant.*

24 CASE NO.: 2:21-cv-00891-RFB-BNW

25 **STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE REPLIES
IN SUPPORT OF DEFENDANTS' MOTION
TO DISMISS FOR LACK OF PERSONAL
JURISDICTION [ECF NO. 21] AND
MOTION TO DISMISS FOR FAILURE TO
STATE A CLAIM [ECF NO. 22]**

26 **(FIRST REQUEST)**

27 Plaintiff GEORGE JARAMILLO, II ("Plaintiff"), by and through his undersigned counsel
of record, the law firms of Brown, Clark, Le, Ames, Stedman & Cevallos LLP and Kaplan Cottner,
and Defendants AREA 15 LAS VEGAS LLC, AREA 15 GLOBAL LLC, ARNOLD FISHER
("Arnold"), KENNETH FISHER ("Kenneth"), STEVEN FISHER ("Steven"), WINSTON

1 FISHER (“*Winston*,” and together with Arnold, Kenneth, and Steven, the “*Fisher Individuals*”),
 2 FISHER BROTHERS MANAGEMENT CO. LLC, and FISHER BROTHERS FINANCIAL AND
 3 DEVELOPMENT COMPANY LLC (collectively, “*Defendants*”), by and through their
 4 undersigned counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby
 5 stipulate to extend the time for filing their Replies in Support of their two pending Motions to
 6 Dismiss, as set forth below:

7 1. On May 6, 2021, Plaintiff filed his Complaint in this Court against Defendants. *See*
 8 *generally* ECF No. 1.

9 2. On August 2, 2021, Arnold, Kenneth, and Steven (and the Fisher company
 10 Defendants), filed a Motion to Dismiss for Lack of Personal Jurisdiction Under FRCP 12(b)(2).
 11 *See* ECF No. 21.

12 3. On August 2, 2021, all Defendants also filed a Motion to Dismiss for Failure to State
 13 a Claim Under FRCP 12(b)(6). *See* ECF No. 22.

14 4. On September 15, 2021, Plaintiff filed his Oppositions to the above two Motions,
 15 making Defendants’ Replies in Support thereof due on September 22, 2021.

16 5. The parties have agreed to allow Defendants further time to file their Replies in
 17 Support of the above Motions.

18 6. This Court may extend this for good cause.

19 7. There is good cause to grant an extension of time to reply to the oppositions to the
 20 above Motions to Dismiss, as Defendants’ counsel has several previously scheduled depositions
 21 set for next week and the Motions and Oppositions are lengthy, substantive, and raise issues that
 22 this Court would benefit from having adequately briefed.

23 8. The instant request is timely, as the deadline for Defendants to file their Replies is
 24 September 22, 2021.

25 9. This is Defendants’ first request for an extension of time to file their replies in
 26 support of the above Motions to Dismiss.

27 10. The parties make the instant request in good faith and without any intent to delay
 28 these proceedings.

1 Based on the foregoing, Plaintiff and Defendants stipulate to a 30-day extension of time for
2 Defendants to file replies in support of the above Motions to Dismiss, through and including
3 October 22, 2021.

4 DATED 15th day of September, 2021.

5 BROWNSTEIN HYATT FARBER SCHRECK, LLP

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12 IT IS SO ORDERED.

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RICHARD E. BOULWARE, II
17 United States District Court

18 DATED this 16th day of September, 2021.